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File No: 52036

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

In re:

CYNTHIA R. HOLMES  
*aka* Cynthia Rose Ralston  
*aka* Cyndi Holmes

Debtor.

Bankruptcy Case No. 19-26984  
Chapter 13

**EX PARTE MOTION TO SHORTEN  
NOTICE OF MOTION TO TERMINATE  
AUTOMATIC STAY AND FOR IN REM  
RELIEF**

Freedom Mortgage Corporation, through counsel, Brian J. Porter, respectfully requests the Court to shorten notice of the Motion to Terminate Automatic Stay as to Freedom Mortgage Corporation and for In-Rem Relief in the above entitled matter. The request is based upon the filing of multiple successive bankruptcy cases on the eve of scheduled foreclosure sales on the property to delay or hinder the foreclosure and process.

Notice will be mailed on September 25, 2019, to the Debtor and Chapter 13 Trustee. The hearing is scheduled for October 15, 2019, at 10:00 AM, with an objection deadline of October 11, 2019.

Respectfully submitted this 25<sup>th</sup> day of September 2019.

/s/ Brian J. Porter

Brian J. Porter  
Attorney for BOA